

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance • • Administration • • Executive/Legal • • Enforcement  
(916) 322-5662 322-5660 322-5901 322-6441

October 11, 1984

Theresa Craigie  
Pillsbury, Madison & Sutro  
225 Bush Street  
San Francisco, CA 94102

Re: FPPC Advice No. A-84-253

Dear Theresa:

This is in reply to your request for an interpretation of Commission regulation 2 Cal. Adm. Code Section 18423. Specifically, you have asked the meaning of the phrase, "pursuant to a uniform policy allowing employees to engage in political activity," as used in Section 18423(a)(2).

Section 18423(a)(2) provides an exception from reporting as in-kind contributions employee compensation paid by an employer if the employee engages in political activity "pursuant to a uniform policy allowing employees to engage in political activity." To be covered by this exception, an employee's activities must be authorized by the employer's written or oral policy stating that all employees may engage in the political activity of their choice during working hours. The policy must specify the amount of time employees may spend engaging in political activity, and must state that the candidates or ballot measures supported or opposed by the employee are not subject to approval by the employer.

Please contact me if you have any questions.

Sincerely,

*Jeanne Pritchard*

Jeanne Pritchard  
Political Reform Consultant

P.S. On an unrelated matter, enclosed is a copy of an advice letter to Gerald H. Upholt which states that informational materials are not reportable as "payments which benefit officials" under the lobbying provisions.